

NHMRC Principles and guidelines for the care and use of non-human primates for scientific purposes (Public Consultation Draft 2015)

Submission from the Australian Veterinary Association Ltd



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The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

General Comments

Overall the 2015 draft provides basic principles and general guidelines for the care and use of non-human primates for scientific purposes.

The role of the veterinarian in ensuring the health and welfare of non-human primates used for scientific purposes should be more strongly emphasised. Veterinarians should be involved in reviews of anaesthetic and surgical protocols used in research and should be involved in directly monitoring the health and welfare of these animals. Veterinarians experienced with non-human primates should be part of the institution's animal ethics inspection team.

Specific Comments

1. Appendices 3-5 from the 2003 edition have been omitted. These covered recommended websites, contact details for the national breeding colonies and relevant legislation. These were useful and should be included with up to date references.
2. Notification requirements to the NHMRC AWC (pages 2 and 3): it is inadvisable to reduce the number of specific activities listed for additional oversight by the NHMRC. It is recommended that the full list as appears in the 2003 document be retained for the 2015 guidelines, because the three situations proposed for exclusion still pose potentially high risk to the welfare of the animals. It is recognised that the reporting requirements do not apply to non-NHMRC funded research; it is therefore proposed that the guidelines should include an equivalent reporting requirement to the state and territory regulators responsible for monitoring implementation of the Code in their respective jurisdictions. This will mean that any use of non-human primates for scientific purposes which is not funded by NHMRC will still be held to the same standards, and this is appropriate given the highly sentient nature of these animals.
3. Part A point 6 (page 5): we query the use of the term 'policy' and whether this should be corrected to the terminology of the 2015 edition which uses 'principles' and 'guidelines'. Perhaps this can be clarified. However, the intent of this clause is supported – ie that no use of great apes is permitted other than that which will have negligible impact or will benefit the individual or the species.
4. Part A point 21 (page 7): veterinarians should be involved in monitoring the health and wellbeing of the animals and alleviation of pain and distress.
5. Part B point 1.1 (page 9): this needs rewording to state that institutions "must establish and implement policies, procedures *and personnel* to manage the health of the animals...". Another sentence should be added that requires a veterinarian experienced in non-human primate health to be involved in managing the health of non-human primates held and used at the institution.
6. Part B points 1.3 and 1.4 (page 9): this should be reworded to include the important role of the veterinarian in monitoring the health and welfare of non-human primates. New wording should state that a

veterinarian must visit on a regular basis to become familiar with the animals and to monitor their health and welfare.

7. Part B point 8.1 (page 14): Add that it is desirable to organise staffing rosters to ensure that staff familiar with the animals are regularly rostered to care for them.

8. Part B point 9 (page 14): Work, Health and Safety: there should be a requirement for institutions to also ensure protection and orientation of physical plant employees and other trades people entering the non-human primate unit.

9. Part B point 9.6 (page 15). If staff are TB screened prior to commencing work with non-human primates is it valid to recommend regular screening when this is not required to work with other animals or people?

10. Part C Checklists and flowchart are helpful resources.

11. Part C point 21 (page21): the health and wellbeing of the animals should be regularly assessed by investigators, animal carers AND veterinarians

12. Although an AEC has a category A Veterinarian, the inspection team would benefit from including an independent veterinarian with experience in non-human primates.